

the Democratic National Convention ends on July 28, 2016, after which it is unlikely that any relief sought in Exhibit I can be obtained.

MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

A. INTRODUCTION

Exhibit I, movant's "Complaint In Intervention..." sets forth the factual basis for this motion, and it is hereby incorporated into this memorandum as if fully set forth. Paragraphs 2, 3, and 6 of Exhibit I clearly show that Beck and Lee, plaintiffs' law firm, cannot possibly represent movant adequately. Paragraph 4 of Exhibit I sets forth factual claims that are not contained in Doc. 8, Plaintiffs' First Amended Complaint. Paragraphs 5 and 7-12 of Exhibit allege new claims for relief not contained in Doc. 8. Exhibit I satisfies all requirements of FRCP Rule 24(a) (2).

B. ARGUMENT

Schonberg Satisfies the Requirements for Intervention of Right

Federal Rule of Civil Procedure Rule 24(a) provides that upon timely application, anyone shall be permitted to intervene in an action:

When the applicant claims an interest relating to the property or transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

Fed. R. Civ. P. 24(a)(2). *Fox v. Tyson Foods, Inc.*, 519 F.3d 1298, 1302-03 (11th Cir. 2008) (quoting *Chiles v. Thornburgh*, 865 F.2d 1197, 1213 (11th Cir. 1989)); *see also Stone v. First*

Union Corp., 371 F. 3d 1305, 1308-09 (11th Cir. 2004).

Here, movant's request for intervention satisfies the requirements of Rule 24(a)(2) for intervention as of right. Movant has a substantial legal interest in the subject matter of the action because he was a former plaintiff to the action, as documented in the papers which movant sent to Beck and Lee, including a signed retainer agreement and proof of movant's contributions to the Bernie Sanders campaign.¹ Movant is not adequately represented by Beck and Lee because of its conflict of interest and failure to seek any equitable relief for Movant. Movant has no substantial interest in money damages because his claim for them is so small; moreover, movant has direct and significant interests in this action that cannot be adequately protected by existing counsel for plaintiffs.

1. Schonberg's Motion to Intervene is Timely

The Eleventh Circuit has identified several factors relevant to determining whether a request for intervention is timely:

(1) the length of time during which the proposed intervenor knew or reasonably should have known of the interest in the case before moving to intervene; (2) the extent of prejudice to the existing parties as a result of the proposed intervenor's failure to move for intervention as soon as it knew or reasonably should have known of its interest; (3) the extent of prejudice to the proposed intervenor if the motion is denied; and (4) the existence of unusual circumstances militating either for or against a determination that their motion was timely.

Georgia v. U.S. Army Corps of Engineers, 302 F.3d 1242, 1259 (11th Cir. 2002) (quoting *Chiles*, 865 F.2d at 1213).

¹ See EXHIBIT A, to the Complaint in Intervention.

Applying these factors to the instant case, Schonberg's application for intervention is timely. The defendants have not yet even filed their response to the Amended Complaint.

2. Movant has a Substantial Legal Interest in this Litigation

For an applicant's interest in the subject matter of the litigation to be cognizable under Rule 24(a)(2), it must be "direct, substantial and legally protectable." *U.S. Army Corps of Engineers*, 302 F.3d at 1249. *See also Chiles*, 865 F.2d at 1212-13 (noting that the focus of a Rule 24 inquiry is "whether the intervenor has a legally protectable interest in the litigation.") The inquiry on this issue "is 'a flexible one, which focuses on the particular facts and circumstances surrounding each [motion for intervention].'" *Chiles*, 865 F.2d at 1214 (quoting *United States v. Perry County Bd. of Educ.*, 567 F.2d 277, 279 (5th Cir. 1978)).

Movant has a legally protectable interest in this litigation. He is a financial and emotional supporter of the Bernie Sanders campaign for President of the United States (POTUS). Movant has been cheated by the defendants' fraud and misrepresentation such that Hillary Rodham Clinton, (HRC), unfairly and illegally received more delegates to the Democratic National Convention than Bernie Sanders. Plaintiffs First Amended Complaint, Doc. 8, does not seek to right that wrong, but movant's Exhibit I does.

3. The Disposition of the Instant Litigation Will Impair the Ability of Movant to Protect His Interest

Movant's opportunity to protect his substantial legal interest will be essentially extinguished absent intervention. The Democratic National Convention, composed of its delegates, will nominate its candidate for President next week. After that time, it will likely be futile for movant to file a separate lawsuit seeking the redress set forth in Exhibit I. And the filing of a separate complaint will waste the Court's resources, time, and money.

And the outcome of this case, including the potential for appeals by existing parties, implicates *stare decisis* concerns that warrant movant's intervention. See *Stone*, 371 F.3d at 1309-10 (recognizing that potential for a negative *stare decisis* effect "may supply that practical disadvantage which warrants intervention of right.") (citing *Chiles*, 865 F.2d at 1214); see also *United States v. City of Los Angeles, Cal.*, 288 F.3d 391, 400 (9th Cir. 2002) (holding that amicus curiae status may be insufficient to protect the rights of an applicant for intervention "because such status does not allow [the applicant] to raise issues or arguments formally and gives it no right of appeal").

4. The Existing Parties Do Not Adequately Represent the United States' Interests

The fourth and final element to justify intervention of right is inadequate representation of the proposed intervenor's interest by existing parties to the litigation. This element is satisfied if the proposed intervenor "shows that representation of his interest 'may be' inadequate." *Chiles*, 865 F.2d at 1214 (citing *Trbovich v. United Mine Workers of America*, 404 U.S. 528, 538 n. 10 (1972)). The burden on the proposed intervenor to show that existing parties cannot adequately represent its interest is "minimal." *Stone*, 371 F.3d 1311; *U.S. Army Corps of Engineers*, 302 F.3d at 1259 (citing *Trbovich*, 404 U.S. at 538 n. 10). Any doubt concerning the propriety of allowing intervention should be resolved in favor of the proposed intervenors because it allows the court to resolve all related disputes in a single action. *Lloyd v. Alabama Dep't of Corrections*, 176 F.3d 1336, 1341 (11th Cir. 1999); *Federal Sav. and Loan Ins. Corp. v. Falls Chase Special Taxing Dist.*, 983 F.2d 211, 216 (11th Cir. 1993).

Movant alleges in Exhibit I that Beck and Lee only zealously representing themselves, that Beck and Lee have violated the rules of professional conduct, that Beck and Lee have failed to seek any equitable relief for movant, and that Beck and Lee may have made unethical

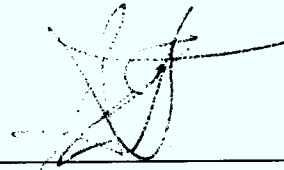
misrepresentations to the Court. Movant's attorney-client relationship with Beck and Lee has been severed forever.

CONCLUSION

For the foregoing reasons, the Court should grant Schonberg's motion to intervene as a matter of right pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure.

Dated: July 21, 2016

RESPECTFULLY SUBMITTED BY

A handwritten signature in black ink, appearing to be 'Steve Schonberg', written over a horizontal line.

Steve Schonberg, *Pro Se*
7938 SE 12th Circle
Ocala, FL 34480
352-789-0610
sschonberg@aol.com

EXHIBIT I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

CASE NO. 16-cv-61511-WJZ

STEVE SCHONBERG, <i>Pro Se</i>)	
7938 SE 12 th Circle)	
Ocala, FL. 34480)	
352-789-0610)	
sschonberg@aol.com)	
)	
Plaintiff in Intervention,)	
)	
v.)	Complaint in Intervention
)	
)	
THE DEMOCRATIC NATIONAL COMMITTEE)	
and ITS CHAIRWOMAN:)	
)	
DEBBIE WASSERMAN SCHULTZ,)	
)	
)	
Defendants.)	
_____)	

**COMPLAINT IN INTERVENTION OF STEVE SCHONBERG FOR FRAUD AND
MISREPRESENTATION, ESTOPPEL, AND FOR AN EMERGENCY INJUNCTION
PROHIBITING THE DNC FROM NOMINATING HILLARY RODHAM CLINTON AS
THE DEMOCRATIC CANDIDATE FOR PRESIDENT**

Introduction

This Complaint in Intervention is being filed pursuant to the Federal Rules of Civil Procedure and the local rules of this most Honorable Court. Intervenor first filed a related case in the USDC for the Middle District of Florida, Ocala Division in *Schonberg et al v. Bernie Sanders et al*, Case No. 5:09-cv-534-Oc-32-JRK. In this prior case, intervenor claimed that the Federal Election Campaign Act of 1974 ("FECA") was unconstitutional, and that corruption in

Congress was going to prevent a “public option” in health insurance from becoming law. Bernie Sanders was named as a defendant only because of intervenor’s hope that Senator Sanders might agree on the record, in court, that there was pervasive, extensive, unrelenting corruption of members of Congress because of FECA. Senator Bernie Sanders has been a national proponent of election reform for many years, and intervenor has supported him in that endeavor for almost a decade.

1. Paragraphs 1,153-173,185-205, 229,231 and 232 of Doc. 8, plaintiffs’ First Amended Complaint, are true and are hereby adopted by reference as if fully set forth. Intervenor Schonberg was a member of the “Sanders” class of plaintiffs before he terminated the litigation Retainer Agreement with Beck and Lee. A copy of the agreement, questionnaire, and proof of donations which intervenor sent to Beck and Lee on June 25, 2016 is attached as EXHIBIT A.

2. Paragraphs 5,7,9,14,21,37,89 of Doc. 8 are adopted by reference because either the amount of the Sanders donations for the individuals are incorrectly represented on Doc. 8, or there is an error of accounting shown by the individual searches on the Federal Election Commission’s (FEC’s) website at fec.gov. As examples, see attached EXHIBIT B, (the William Franz search), and EXHIBIT C, (the William Crandall search).¹ None of the individuals identified in these paragraphs contributed more than \$200 to the Bernie Sanders campaign according to the FEC, contrary to the representation of Beck and Lee in Doc. 8. Beck and Lee, either intentionally or negligently, misrepresented the class members’ dollar amount of contributions to the Bernie Sanders campaign for President in the above paragraphs. Even negligent misrepresentations to the Court are violations of the rules of ethics for attorneys.

¹Due to a shortage of time, intervenor stopped searching fec.gov for alleged high-dollar donors to the Sanders campaign at ¶89 of Doc. 8. Mr. Crandall was claimed to have contributed \$21,705.34 in ¶37 of Doc. 1 and \$1,705.34 in ¶37 of Doc. 8, but Exhibit C shows no contribution of \$200 or more, the minimum amount required by the FEC to find the contribution on its searchable database. Based on intervenor’s familiarity with fec.gov, reportable contributions that include 34 cents in the total are extremely rare or completely non-existent.

Intentional misrepresentations to the Court are grounds for disbarment.

3. When intervenor signed his agreement with Beck and Lee, he believed that Beck and Lee was going to represent the members of the class “zealously” and “within the bounds of the law,” as required by the Model Rules of Professional Conduct of the American Bar Association. Instead, because of an undisclosed conflict of interest, Beck and Lee are zealously representing themselves at the expense of their class members.

COUNT I

Intervenor’s Claims Which Are Not Included in Doc. 8

4. Hillary Rodham Clinton (HRC) is unfit to become the President of the United States (POTUS) for at least the following reasons:

(a) As Secretary of State, HRC set up and used a private email server to conduct government business. This matter was extensively investigated by the FBI and its Director, James Comey. Director Comey concluded that HRC and her aides were “extremely careless in their handling of very sensitive, highly classified information.” Although no criminal charges were filed against HRC, the State Department probe has been reopened.² No supporter of Bernie Sanders wants an extremely careless Democratic Nominee for POTUS, including intervenor.

(b) FBI Director Comey confirmed the probability that HRC lied to Congress and to the American public when she repeatedly said didn’t send or receive any e-mails that were classified “at the time.” HRC also probably lied repeatedly by claiming she had turned over all of her “work related” emails, when Director Comey found hundreds that had not been turned over. HRC also probably lied in claiming her use of a private server and e-mail domain was permitted

² See BBC report at <http://www.bbc.com/news/election-us-2016-36742095>.

by law and regulation. This claim was refuted by the State Department's Inspector General.³ It is likely that the FBI has gotten or will get a referral from Congress to determine if HRC committed perjury when she told a subcommittee that "there was nothing marked classified in my emails."⁴ Neither intervenor nor most other Bernie Sanders supporters want a liar who might be indicted as their POTUS nominee.

(c) Millions of dollars have been spent investigating HRC's extreme carelessness with her home server, including one by Judicial Watch because of HRC mishandling documents that should have been available through the Freedom of Information Act. In that case, USDC Judge Emmet G. Sullivan remarked, "[I]t just boggles the mind that the State Department allowed this circumstance to arise in the first place."⁵ Neither intervenor nor most other Bernie Sanders supporters want their POTUS candidate to have wasted tens of millions of tax dollars because of misconduct or a candidate who's misconduct "boggles the mind" of a federal judge.

(d) HRC has, for the last several months, received unfavorable ratings from the general population,⁶ and her "untrustworthy" rating is overwhelmingly bad. Sixty-seven percent of voters in a recent NYT/CBS poll say "**Clinton is not honest and trustworthy.**"⁷ Neither intervenor nor the majority of plaintiffs want the DNC to fraudulently select a candidate who is not honest and trustworthy. The defendants should know now, and should have known a long time ago, that they should not rig elections to select a "loser" for the Democratic Nominee for POTUS. HRC is a loser.

³ These HRC email statements have been extensively commented upon in online media. See, e.g. <http://www.nationalreview.com/article/437606/hillary-clintons-eight-email-lies-exposed-james-comey>, and https://en.wikipedia.org/wiki/Hillary_Clinton_email_controversy#FBI_investigation.

⁴ A referral has been sent to the U.S. Attorney for Washington, D.C., <http://www.cbsnews.com/news/house-gop-chairs-call-for-hillary-clinton-perjury-investigation/>



⁵ See http://www.nytimes.com/2016/03/03/us/politics/as-presidential-campaign-unfolds-so-do-inquiries-into-hillary-clintons-emails.html?_r=0.

⁶ See <http://www.pollingreport.com/hrc.htm>.

⁷ See <http://townhall.com/tipsheet/guybenson/2016/07/15/nytcbs-poll-hillarys-untrustworthy-rating-soars-to-67-percent-n2192807>

(e) Intervenor alleges that the DNC “system was rigged” in favor of HRC and against Bernie Sanders long before a Democratic primary election was held in any state. “Hillary for America” is the name of the HRC principle campaign committee. “Hillary Victory Fund” is the name of a joint fundraising committee between and among Hillary for America, the DNC, and 33 state Democratic committees. Here is a snip from the FEC file proving that the Hillary Victory Fund began as a joint fundraising committee between Hillary for America and defendant DNC:

Joint Fundraising Representative:

- (g)  This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h)  This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.	HILLARY FOR AMERICA	FEC ID number	C00575795
2.	DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE	FEC ID number	C00010603

EXHIBIT D has additional snips from the FEC filings, showing that the Hillary Victory Fund began in September of 2015 and the DNC had raised millions of dollars for itself and Hillary for America before the 2016 Democratic primary season had begun.⁸ Hillary Clinton was part and parcel to the fraud and misrepresentation alleged in Doc. 8 and ¶1 above. Neither intervenor nor most other Bernie Sanders supporters want their POTUS candidate to have committed fraud and misrepresentation.

5. But for the fraud and misrepresentation of HRC and the DNC, Bernie Sanders would have received the majority of delegate and super-delegate commitments for support at the

⁸ Defendant Wasserman Schultz must have been the instigator of the fraud and misrepresentation alleged in Doc. 8. Her fraud was massive, intentional, and may deprive Bernie Sanders of his rightful place as the Democratic nominee for POTUS. Wasserman Schultz appears to have violated 18 U.S. Code § 1341 which makes frauds and swindles a federal crime. Intervenor may file a criminal complaint against her when he has the opportunity at a later date.

Democratic National Convention; and Bernie Sanders, not HRC, would be the presumptive POTUS nominee of the DNC before the convention begins on July 25, 2016.

COUNT II

Beck and Lee Violated Florida State Bar Disciplinary Rules and Failed to Divulge a Huge Conflict of Interest.

6. On page 2 of the Beck and Lee retainer agreement in EXHIBIT A, Beck and Lee agreed, “Counsel shall disclose to you any conflicts as soon as they become known to the Counsel.” Beck and Lee knew or should have known that there was a conflict of interest at the time Doc. 8 was filed, because:

(a) The vast majority of class members gave less than \$100 to the Bernie Sanders campaign. Bernie Sanders often said during the campaign that the average contribution to his campaign was “\$27 bucks.”

(b) If a settlement or judgment against the defendants were obtained, the vast majority of the class members would receive only a few cents on the dollar on the cost of their contributions to Bernie Sanders.

(c) If a settlement or judgment against the defendants were obtained, Beck and Lee could earn millions of dollars in attorney fees, even though most class members, including intervenor, would only be awarded a few dollars in damages. The damages intervenor could possibly recover are less than the cost of preparing and mailing his motion to intervene in this lawsuit.

(d) Most class members, including intervenor, believed that the primary purpose of this lawsuit was to compensate the class members by obtaining a Court Order preventing the DNC

from nominating HRC as the Democratic nominee for POTUS. Intervenor was stunned when he reviewed the docket in this matter, and there was not a single claim that HRC was going to unfairly and inequitably become the Democratic nominee in spite of widespread fraud and misrepresentation by the DNC and HRC.

(e) If Beck and Lee adequately represented intervenor and thousands of other class members, it would have pled that HRC's presumptive nomination was based on fraud and misrepresentation. And Beck and Lee would have demanded that Bernie Sanders become the Democratic Nominee because HRC's presumptive nomination is based on fraud, misrepresentation and abuse by HRC and the insiders of the DNC. But had Beck and Lee succeeded in pursuing these contentions, its claim for a 20% attorney fee would vanish. All members of the class action lawsuit would be "made whole" if Bernie Sanders becomes the Democratic nominee for POTUS. No money damages would flow. Beck and Lee outrageously violated the conflict of interest rule of the Florida Bar.⁹ Beck and Lee purposely failed to plead causes of action to prevent HRC from becoming the Democratic Nominee for POTUS because it was contrary to the economic interests of Beck and Lee.

(f) The doctrine of estoppel, in its broad interpretation, prevents a person and an entity from benefitting from their own wrongdoing. The DNC and HRC are estopped from benefitting by their perversion of the rules of the DNC as set forth in ¶1, above. Beck and Lee knew or

⁹ Rule 4-1.7 of the Rules of Professional Conduct of the Florida Bar states:

(a) **Representing Adverse Interests.** Except as provided in subdivision (b), a lawyer must not represent a client if:

(1) the representation of 1 client will be directly adverse to another client; or

(2) there is a substantial risk that the representation of 1 or more clients will be materially limited by the lawyer's responsibilities to another client, a former client or a third person or by a personal interest of the lawyer.

should have known their lawsuit was an unethical “money grab” for attorney fees because the law firm failed to allege estoppel or any other theory in Doc. 8 to prevent HRC from becoming the Democratic Nominee for POTUS.

(g) Beck and Lee knew when they asked intervenor to become a member of the class that it had violated the terms of its own agreement in EXHIBIT A by failing to disclose its conflict of interest. At the very least, Beck and Lee should have tried to obtain intervenor’s informed consent to its representation in the presence of a conflict of interest.

(h) The Court should appoint class counsel other than Beck and Lee, so that a Second Amended Complaint can be filed alleging equitable relief requiring Bernie Sanders to be the DNC’s nominee for POTUS. Intervenor agrees to be a member of this class as will thousands of other plaintiffs in this lawsuit.

COUNT III

Defendant DNC Is Estopped and Prohibited from Nominating Hillary Rodham Clinton to be the Democratic Nominee for President of the United States.

7. Each and every paragraph above is hereby restated and incorporated as if fully set forth.

8. HRC received a greater delegate count than Bernie Sanders because the democratic primaries were “rigged” in favor of HRC due to the defendants’ fraud and misrepresentation. Defendants knew before and during the primary season that the DNC was supporting HRC with money and voter turnout to the detriment of the Bernie Sanders campaign.

9. By rigging the Democratic caucuses and primaries in favor of HRC and against Bernie Sanders, the DNC violated its charter. But despite the rigged elections, the delegate count was very close, with HRC getting 2205 delegates and Bernie Sanders receiving 1846 delegates.¹⁰

¹⁰ See <http://www.bloomberg.com/politics/graphics/2016-delegate-tracker/>

10. Mathematical analysis can determine how much a presidential campaign spends to obtain the support of a single delegate. The Hillary Victory Fund was illegal and contrary to the charter of the DNC. Attached as EXHIBIT E is the 2 year summary of the Hillary Victory Fund. It shows \$42 million in expenses, of which 2/3rds or about \$28 million went to pay expenses via the Hillary for America committee.¹¹ And \$22 million of the “Transfers to Affiliated Committees” went to the Hillary for America committee, (see attached EXHIBIT F, the 2 year summary of the Hillary for America committee.) EXHIBIT F also shows expenditures of \$192 million, which is the numerator in the fraction to determine cost per delegate, with the denominator being the 2205 delegates of HRC. The cost per delegate for HRC is \$192 million divided by 2205, or \$87,000 per delegate.

11. Had the DNC primaries not been rigged, the \$22 million illegally received by the Hillary for America from the Hillary Victory Fund would not have occurred. But for the rigged election, HRC would have obtained only 1954 delegates and Bernie Sanders would have received 2097 delegates based on the simple math of campaign expenditures per delegate.¹²

12. Intervenor, like most of the plaintiffs, has been cheated out of the nomination of their POTUS candidate, Bernie Sanders, by the defendants’ misconduct. The lawsuit filed by Beck and Lee is utterly useless to intervenor. The lawsuit filed by Beck and Lee fails to request any equitable relief so that the DNC must nominate Bernie Sanders as its candidate for the President of the United States.

¹¹ See https://www.washingtonpost.com/politics/democratic-party-fundraising-effort-helps-clinton-find-new-donors-too/2016/02/19/b8535cea-d68f-11e5-b195-2e29a4e13425_story.html

¹² If Clinton for America hadn’t received the \$22 million from the Hillary Victory Fund, its expenditures would have decreased from \$192 million to \$170 million. \$170 million divided by the \$87,000 cost per delegate = 1954 delegates for HRC. This calculation doesn’t even take into account the \$28 million in expenses from the Hillary Victory Fund for the benefit of Hillary for America.

PRAYER FOR RELIEF

WHEREFORE, Intervenor prays for the following relief:

- A. For declaratory judgment and *immediate EMERGENCY* injunctive relief enjoining the defendants from opposing the nomination of Bernie Sanders as the Democratic Nominee for President of the United States.
- B. For declaratory judgment and *immediate EMERGENCY* injunctive relief enjoining defendant DNC from nominating Hillary Rodham Clinton as the Democratic Nominee for President of the United States.
- C. For declaratory judgment and injunctive relief declaring illegal and enjoining defendants' violation of and failure to follow the Charter and Bylaws of the Democratic Party;
- D. For an Order preventing Beck and Lee from becoming class counsel because of their conflict of interest and violation of the Rules of Professional Conduct of the Florida Bar.
- E. For an Order requiring Beck and Lee to give notice and access to all class members of the filing of this Complaint in Intervention.
- F. For an Order requiring Beck and Lee to give notice to all class members of Beck and Lee's misrepresentation and conflict of interest that was not divulged in the Attorney-Client Retainer agreement signed by the members of the class.
- G. For an Order appointing class counsel other than Beck and Lee who can competently represent the class members so that a Second Amended Complaint can be filed with claims proving that Bernie Sanders is the only legitimate nominee for President of the United States of the Democratic National Committee.
- H. For an Order requiring Beck and Lee to provide all of its information to new class counsel in regard to every one of its proposed class members.

I. For an Order notifying the Florida Bar of Beck and Lee's probable violations of the bar's Rules of Professional Conduct.

J. Whatever other and additional relief the Court deems just.

RESPECTFULLY SUBMITTED BY:

/s/ Steve Schonberg
Steve Schonberg, *Pro Se*
7938 SE 12th Circle
Ocala, FL 34480
352-789-0610
Email: sschonberg@aol.com

EXHIBIT A

B E C K & L E E
t r i a l l a w y e r s m i a m i

Corporate Park at Kendall
12485 SW 137th Avenue, Suite 205
Miami, Florida 33186

TEL: 305-234-2060
FAX: 786-664-3334
www.beckandlee.com

June 18, 2016

Re: DNC Fraud Class Action Lawsuit – Attorney-Client Retainer

Dear Client:

On behalf of Beck & Lee Trial Lawyers, Law Offices of Cullin O'Brien, P.A. and Antonino Hernandez, P.A. (collectively, "Counsel"), we want to thank you for the opportunity to represent you as a proposed plaintiff and class representative in connection with your potential claims against the Democratic National Committee and any other affiliated entities or persons ("defendants"), in connection with the Democratic primaries of 2015-2016 ("Litigation").

Fee Agreement and Costs

You will not be responsible for any attorneys' fees or expenses that the Counsel incurs in connection with this matter. Counsel will prosecute your claims on a contingency fee basis and advance all out-of-pocket costs necessary for vigorous and effective representation.

All attorneys' fees in a certified class action must be approved by the court. Counsel will be compensated based on a court-awarded reasonable fee, or compensation not exceeding 33 1/3% of the total recovery in the Litigation as ordered or approved by the Court, whichever is higher. In addition, Counsel will also seek reimbursement of any costs which we incur on your behalf from the same fund, or also directly from the defendants by agreement or Court order.

Costs may include, among other expenses, court filing fees, transcript and deposition costs, computerized legal research costs, costs of reproducing documents, parking and travel costs, fees which accountants or expert witnesses retained on your behalf charge us, and other similar expenditures. Counsel have agreed to advance such costs and to seek reimbursement only through an application to the Court.

Mutual Responsibilities

Counsel will provide the legal services which are considered appropriate for the matter and in accordance with prevailing standards. You will be reasonably available to confer with us upon request, will provide us with such documents and information as you may possess relating to the matter, will disclose all facts and circumstances of which may

DNC Fraud Class Action Lawsuit
June 18, 2016
Page 2 of 2

bear upon our handling of the matter, and will otherwise assist our efforts as we request or require.

You recognize that the Counsel is representing other individuals or entities in this litigation and agree that any conflicts caused by such representation are waived. Furthermore, you, as the representative plaintiff, must be able to represent the interests of the class fairly and adequately and without any conflict-of-interest with class members. Counsel shall disclose to you any conflicts as soon as they become known to the Counsel.

Termination

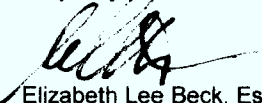
Counsel anticipates a long and mutually, satisfactory relationship. However, you have the right to terminate this litigation Retainer Agreement by giving us written notice. If you terminate this Retainer Agreement, you will have no further obligation to us related to this matter. We also have the right to terminate our engagement by giving you written notice if the Counsel determines that continuing to represent you in this litigation would be unethical, impractical, improper, or outside the best interests of the class. If we are compelled to withdraw for any of these reasons, you will have no further obligation to us related to this matter.

Please review this agreement carefully. If this agreement accurately reflects your understanding of our attorney-client relationship, please indicate your approval and acceptance by signing below and returning it to me. We look forward to working with you on this matter.

Statement of Client's Rights

Please read the copy of the Statement of Client's Rights, attached hereto as Exhibit A, before signing this Agreement, and Duties of a Class Representative, attached hereto as Exhibit B.

Very truly yours,


Elizabeth Lee Beck, Esq.
For all counsel

Encls.

Agreed to by Client:

Steven Schonberg

Name: _____

Signature:  _____

BECK & LEE

12485 SW 137th Avenue, Suite 205 | Miami, Florida 33186 | 305-234-2060

CONFIDENTIAL – ATTORNEY-CLIENT PRIVILEGED

DNC FRAUD CLASS ACTION LAWSUIT QUESTIONNAIRE FOR CLIENTS (2 PAGES)

Name	Steven Schonberg
Address	7938 SE 12 th Circle, Ocala, FL 34480
Email	sschonberg@aol.com
Best # where you can be reached	352-789-0610
Did you donate to the Democratic National Committee? (You may have donated directly through their website at www.democrats.org , or possibly through Act Blue)	I don't think so, but I did donate to Bernie, always thru Act Blue.
When, and how much, did you donate to the DNC?	
How did you donate to the DNC? (check in the mail, through website, ActBlue, etc.)	
Did you donate to Bernie's campaign? (this is almost always done through Act Blue)	Yes
When, and how much, did you donate directly to Bernie?	About \$120 split over several donations in the past year.
How did you donate to Bernie? (ActBlue, mailed a check to his campaign, etc.)	ActBlue
Are you a Bernie supporter? Y/N	Y
Have you ever donated to Hillary Clinton's campaign(s)?	NO!
Anything else you would like us to know?	If there was collusion between the DNC and Hillary Clinton's campaign to the benefit of Hillary Clinton, then Hillary Clinton and her campaign should be named as defendants in this lawsuit.

Steven Schonberg Partial Evidence of Political Donations to 2016 Presidential Race

From American Express Card Statements

	TIP	\$6.99	
09/15/15	ACTBLUE*BERNIE.SANDE617-517-7600 MA 617-517-7600		\$10.00
FSLBTRIALP.AX.MELDIAA@UP.COM			
09/03/15	SP * BERNIE 2016 BURLINGTON VT 8554237643		\$22.54
PAYMENT NUMBER 2 5 JULY 2015 04 PM			
05/26/15	ACTBLUE*BERNIE.SANDE617-517-7600 MA 617-517-7600		\$10.00

Southwest Visa 2016

06.05	ACTBLUE*DONATETODEMS actblue.com MA	10.00
06.04	ACTBLUE*DONATETODEMS actblue.com MA	10.00
06.04	ACTBLUE*DONATETODEMS actblue.com MA	10.00
03.28	& ACTBLUE BERNIE.SANDERS actblue.com MA	10.00
02.29	ACTBLUE BERNIE.SANDERS 617-517-7600 MA	10.00

EXHIBIT B

EXHIBIT C



FEDERAL ELECTION COMMISSION

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Occupation	Committee Name	Transaction Date	Amount	Image Number
FRANZ, RANDALL WILLIAM	COLUMBUS	OH	43215	SELF EMPLOYED	SURGEON	AMERICAN COLLEGE OF SURGEONS PROFESSIONAL ASSOCIATION PAC	10/17/2007	1000.00	11931290350
FRANZ, WILLIAM	COSTA MESA	CA	92626	NOT EMPLOYED	NOT EMPLOYED	SANDERS, BERNARD VIA BERNIE 2016	03/06/2016	200.00	20160422901506610Z
FRANZ, WILLIAM	CRYSTAL LAKE IL	60014		FRANZ & KONICK	ATTORNEY	MANZULLO, DONALD A. VIA DONALD A. MANZULLO FOR CONGRESS	09/28/2006	500.00	26960505640
FRANZ, WILLIAM	DALLAS	TX	75223		INFORMATION REQUESTED	HUMAN RIGHTS HUMAN RIGHTS CAMPAIGN PAC	08/27/2007	300.00	29991066448
FRANZ, WILLIAM	DALLAS	TX	75223		INFORMATION REQUESTED	HUMAN RIGHTS CAMPAIGN PAC	11/20/2007	300.00	29991067750
FRANZ, WILLIAM	FRONTENAC	MO	63131	XTRA CORPORATION	PRESIDENT & CEO	CRUZ, RAFAEL EDWARD TED VIA CRUZ FOR PRESIDENT	11/23/2015	5400.00	201603289012170602
FRANZ, WILLIAM	FRONTENAC	MO	63131	XTRA CORPORATION	PRESIDENT & CEO	CRUZ, RAFAEL EDWARD TED VIA CRUZ FOR PRESIDENT	12/31/2015	2700.00	201603289012170602
FRANZ, WILLIAM	FRONTENAC	MO	63131	XTRA CORPORATION	PRESIDENT & CEO	CRUZ, RAFAEL EDWARD TED VIA CRUZ FOR PRESIDENT	12/31/2015	2700.00	201603289012170602
FRANZ, WILLIAM	PHILADELPHIA PA	19130		ELECTRICIANS LOCAL 98	ENGINEER	INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98 COMMITTEE ON POLITICAL EDUCATION	04/02/2003	201.80	24990743044
FRANZ, WILLIAM	PHILADELPHIA PA	19130		ELECTRICIANS LOCAL 98	ENGINEER	INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98 COMMITTEE ON POLITICAL EDUCATION	07/26/2010	531.04	10931412054
FRANZ, WILLIAM	PHILADELPHIA PA	19130		LOCAL UNION # 98 I.B.E.W./ELECTRICIANS		INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98 COMMITTEE ON POLITICAL EDUCATION	04/03/2001	221.00	21990258261
FRANZ, WILLIAM	SAINT LOUIS MO	63131		XTRA CORPORATION	PRESIDENT & CEO	SARAH PAC	07/20/2010	5000.00	10931289141
FRANZ, WILLIAM	ST LOUIS MO	63101		FRANZ & FRANZ P C		NIXON, JEREMIAH W. LADY VIA NIXON CAMPAIGN FUND	06/16/1997	250.00	97020073391

EXHIBIT C

Contributions to All Other Political Committees Except Joint Fundraising Committees

Contributor Name	City	State	ZIP Code	Employer	Occupation	Committee Name	Transaction Date	Amount	Image Number
CRANDALL, WILLIAM	MISSOULA	MT	59808	MODERN MACHINERY	VP	TESTER, JON VIA MONTANANS FOR TESTER	03/09/2011	250.00	11020151185
CRANDALL, WILLIAM	SAN MATEO	CA	94402	COLLEGE OF SAN MATEO		CAMPBELL, THOMAS VIA TOM CAMPBELL FOR CONGRESS	03/02/1999	1000.00	99034731483
CRANDALL, WILLIAM	SAUSALITO	CA	94965	SMITH-KETTLEWELL	SCIENTIST	MARTIN, JAMES FRANCIS VIA MARTIN FOR SENATE INC	11/25/2008	200.00	28020820740
CRANDALL, WILLIAM	SAUSALITO	CA	94965			ACTBLUE	10/19/2009	-15.00	29935478481
CRANDALL, WILLIAM B.	PALM CITY	FL	34990	N/A	RETIRED	HARRELL, GAYLE VIA FRIENDS OF GAYLE HARRELL	02/14/2008	500.00	28931145685
CRANDALL, WILLIAM B. MR.	PALM CITY	FL	34990	SELF	RETIRED	MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE	09/21/2015	500.00	201510209003213222
CRANDALL, WILLIAM F	LEAWOOD	KS	66208	THE ALLEN GROUP	REAL ESTATE DEVELOPER	ROBERTS, PAT VIA PAT ROBERTS FOR US SENATE INC	09/25/2008	250.00	28020633497
CRANDALL, WILLIAM J	INCLINE VILLAGE	NV	89451			NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS	12/02/1997	250.00	98032660659
CRANDALL, WILLIAM J	ROCHESTER	NY	14625	ROCHESTER LIQUOR		D'AMATO, ALFONSE VIA FRIENDS OF SENATOR D'AMATO (1998 COMMITTEE)	03/31/1998	1000.00	98020080748
CRANDALL, WILLIAM J	ROCHESTER	NY	14625			LAZIO, RICK A VIA LAZIO 2000 INC	08/07/2000	2000.00	20020270459
CRANDALL, WILLIAM J	ROCHESTER	NY	14625			LAZIO, RICK A VIA LAZIO 2000 INC	09/04/2000	1000.00	21020062037
CRANDALL, WILLIAM J	ROCHESTER	NY	14625			LAZIO, RICK A VIA LAZIO 2000 INC	09/04/2000	1000.00	21020062037
CRANDALL, WILLIAM J	ROCHESTER	NY	14625			SCHUMER, CHARLES EVIA FRIENDS OF SCHUMER	07/19/2001	1000.00	22020130529
CRANDALL, WILLIAM J	ROCHESTER	NY	14625	EBER BROTHERS	GENERAL MANAGER	GEPHARDT, RICHARD AVIA GEPHARDT FOR PRESIDENT, INC.	01/14/2004	2000.00	25990165560
CRANDALL, WILLIAM J BRIG. GEN.	DELAND	FL	32724	RETIRED	RETIRED	NRCC	10/27/2003	200.00	24961284284
CRANDALL, WILLIAM J MR	ROCHESTER	NY	14625	BEST EFFORTS MADE	BEST EFFORTS MADE	NAPLES, NANCY A VIA NANCY NAPLES FOR CONGRESS	10/25/2004	1000.00	25980175754
CRANDALL, WILLIAM J MR.	ROCHESTER	NY	14625	EBER BROS. ROCHESTER	GENERAL MANAGER	BUSH, GEORGE W VIA BUSH-CHENEY '04 (PRIMARY) INC	11/24/2003	2000.00	24962752467
CRANDALL, WILLIAM J. GEN.	DE LAND	FL	32724	USAF RETIRED/RETIRED		MICA, JOHN L. MR. VIA MICA FOR CONGRESS	03/16/2002	250.00	22990703658
CRANDALL, WILLIAM MR	PALM CITY	FL	34990	INFORMATION REQUESTED PER BEST EFFE	INFORMATION REQUESTED PER BEST EFF	BROWN, SCOTT P VIA FISCAL RESPONSIBILITY PAC	09/06/2012	250.00	13020040520
CRANDALL, WILLIAM MR	PALM CITY	FL	34990	MARTIN HEALTH SYSTEM	TRUSTEE	AMERICAN HOSPITAL ASSOCIATION PAC	07/10/2014	250.00	14970095657
						HUNTSMAN, JON VIA JON			

CRANDALL, WILLIAM MR.	PALM CITY FL	34990	RETIRED	RETIRED	<u>HUNTSMAN FOR PRESIDENT INC.</u>	07/14/2011	500.00	<u>12950031034</u>
CRANDALL, WILLIAM W. PROF.	SAN MATEO CA	94402	CSM/PROFESSOR		<u>MCCAIN, JOHN S. VIAMCCAIN 2000 INC</u>	02/07/2000	500.00	<u>20990075160</u>
Total Contributions:								

EXHIBIT D

Two-Year Summary

Report Summaries

Filings

Jump To [New Search](#)

Export Options:

 Metadata
  XML
  CSV
  JSON

CURRENT COMMITTEE INFORMATION

C00586537

Name: HILLARY VICTORY FUND

Address: PO BOX 5256, NEW YORK, NY 101855256

Treasurer Name: JONES, ELIZABETH

Type: N - NON-QUALIFIED NON-PARTY

Designation: J - JOINT FUNDRAISER

Party:

2016

Document Filed	Amended	Filed On	From Date	End Date	Pages	Page by Page	View / Download
Statement Of Organization	Amend	07/01/2016			40	201607019020110028	PDF HTML / FEC-1080677
April Quarterly	New	04/15/2016	01/01/2016	03/31/2016	6801	201604159012546036	PDF HTML / FEC-1064088
April Quarterly - Lobbyist Bundling Report	New	04/15/2016	01/01/2016	03/31/2016	2	201604159012556278	PDF HTML / FEC-1064104
July Quarterly	New	07/15/2016	04/01/2016	06/30/2016	19497	201607159020621332	PDF HTML / FEC-1087146
July Quarterly / Semi-Annual - Lobbyist Bundling Report	New	07/15/2016	04/01/2016	06/30/2016	6	201607159020642049	PDF HTML / FEC-1087181

2015

Document Filed	Amended	Filed On	From Date	End Date	Pages	Page by Page	View / Download
Statement Of Organization	New	09/10/2015			4	201509109001633570	PDF HTML / FEC-1024437
Statement Of Organization	Amend	09/16/2015			35	201509169002680605	PDF HTML / FEC-1024982
Statement Of Organization	Amend	11/02/2015			34	201511029003261234	PDF HTML / FEC-1031608
October Quarterly	New	10/15/2015	07/01/2015	09/30/2015	41	201510159003076346	PDF HTML / FEC-1029544
Year-End	New	01/31/2016	10/01/2015	12/31/2015	1416	201601319005283302	PDF HTML / FEC-1047317
Quarterly Year End / Semi-Annual - Lobbyist Bundling Report	New	01/31/2016	10/01/2015	12/31/2015	3	201601319005281865	PDF HTML / FEC-1047313

Hillary Victory Fund

Report Covering the Period:		From:	M M J J D J J Y Y Y				To:	M M J J D J J Y Y Y			
			10	01	15	2015		12	31	2015	
			COLUMN A This Period					COLUMN B Calendar Year-to-Date			
6.	(a) Cash on Hand January 1, 2015										0.00
	(b) Cash on Hand at Beginning of Reporting Period.....					1754830.28					
	(c) Total Receipts (from Line 19)					23759026.88					26921630.45
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)					25513857.16					26921630.45
7.	Total Disbursements (from Line 31)					12710340.46					14118113.75
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))					12803516.70					12803516.70
9.	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)					0.00					
10.	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)					45161.48					

EXHIBIT E

Details for Committee ID : C00586537**Two-Year Summary**

Report Summaries Filings

Two-Year Period

2016

New Search

Export Options:
 Metadata XML CSV JSON
2016 COMMITTEE INFORMATION

C00586537

Name: HILLARY VICTORY FUND
Address: PO BOX 5256, NEW YORK, NY 101855256
Treasurer Name: JONES, ELIZABETH
Type: N - NON-QUALIFIED NON-PARTY
Designation: J - JOINT FUNDRAISER
Party:

FINANCIAL SUMMARY - HILLARY VICTORY FUND

From: 07/01/2015 To: 06/30/2016 ?

I. RECEIPTS

Itemized Individual Contributions
 Unitemized Individual Contributions
 Total Individual Contributions
 Party Committees Contributions
 Other Committees Contributions

TOTAL CONTRIBUTIONS

Transfers from Affiliated Committees
 Loans Received

Loan Repayments Received

Offsets to Operating Expenditures

Refunds

Other Receipts

Non-Federal Transfers

Levin Funds

Total Transfers

Total Federal Receipts

TOTAL RECEIPTS

\$105,942,715

\$33,939,597

\$139,882,312

\$192

\$1,593,844

\$141,476,349

\$0

\$0

\$0

\$246,161

\$0

\$468,770

\$0

\$0

\$0

\$0

\$142,191,280

\$142,191,280

Receipts

Itemized Individual Contributions
 Offsets to Operating Expenditures
 Unitemized Individual...
 Other Receipts
 Other Committees Con...
 Other 23.9% 74.5%

II. DISBURSEMENTS

Allocated Operating Expenditures - Federal

Allocated Operating Expenditures - Non-Federal

Other Federal Operating Expenditures

TOTAL OPERATING EXPENDITURES

Transfers To Affiliated Committees

Contributions to Committees

Independent Expenditures

Coordinated Party Expenditures

Loans Made

Loan Repayments Made

Individual Refunds

Political Party Refunds

Other Committee Refunds

TOTAL CONTRIBUTION REFUNDS**Disbursements**

Individual Refunds
 Other Disbursements
 Other Federal Operating Expenditures
 Transfers To Affiliated Committees
 Other 41.9% 56.7%

\$0

\$0

\$42,019,773

\$42,019,773

\$0

\$0

\$0

\$0

\$0

\$0

\$891,383

\$0

\$55,000

\$946,383

Other Disbursements	\$468,770
Allocated Federal Election Activity - Federal Share	\$0
Allocated Federal Election Activity - Levin Share	\$0
Federal Election Activity - Federal Only	\$0
TOTAL FEDERAL ELECTION ACTIVITY	\$0
Total Federal Disbursements	\$100,256,740
TOTAL DISBURSEMENTS	\$100,256,740

III. CASH SUMMARY

Beginning Cash On Hand	\$0
Ending Cash On Hand	\$41,934,539
Net Contributions	\$140,529,965
Net Operating Expenditures	\$41,773,612
Debts/Loans Owed By	\$0
Debts/Loans Owed To	\$0

EXHIBIT F


Details for Committee ID : C00575795**Two-Year Summary**

Report Summaries Filings

Two-Year Period

2016

New Search

 Metadata
 XML
 CSV
 JSON

Export Options:

2016 COMMITTEE INFORMATION

Name: HILLARY FOR AMERICA

Address: P.O. BOX 5256, NEW YORK, NY 101855256

Treasurer Name: VILLARREAL, JOSE H.

Type: P - PRESIDENTIAL

Designation: P - PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE

Party: DEMOCRATIC PARTY

C00575795

CANDIDATE INFORMATION

CLINTON, HILLARY RODHAM

Office: P - Presidential

State: US, District: 00

ID: P00003392

FINANCIAL SUMMARY - HILLARY FOR AMERICA

From: 04/01/2015 To: 05/31/2016 ?

I. RECEIPTS

Federal Funds

\$0

Itemized Individual Contributions

\$162,534,527

Unitemized Individual Contributions

\$44,958,555

Total Individual Contributions

\$207,493,084

Party Committees Contributions

\$1,000

Other Committees Contributions

\$1,271,793

Candidate Contributions

\$899,423

TOTAL CONTRIBUTIONS

\$209,665,300

Transfers from Authorized Committees

\$22,440,000

Candidate Loans

\$0

Other Loans

\$0

TOTAL LOANS

\$0

Offsets to Operating Expenditures

\$6,047,917

Fundraising Offsets

\$0

Legal and Accounting Offsets

\$0

TOTAL OFFSETS

\$6,047,917

Other Receipts

\$28,802

TOTAL RECEIPTS

\$238,182,020

Receipts

Itemized Individual Contributions Offsets to Operating E... Unitemized
 Individual, Candidate Contributions Transfers from Authori... Other Committees
 Con... Other 18.9% 68.2%

II. DISBURSEMENTS

Operating Expenditures

Transfers To Authorized Committees

Fundraising

Exempt Legal and Accounting

Candidate Loan Repayments

Other Loan Repayments

TOTAL LOAN REPAYMENTS

Individual Refunds

Political Party Refunds

Other Committee Refunds

TOTAL CONTRIBUTION REFUNDS

Other Disbursements

Disbursements

Individual Refunds Operating Expenditures Other 98.5%

\$192,858,026

\$0

\$0

\$0

\$0

\$0

\$0

\$2,818,656

\$0

\$4,500

\$2,823,156

\$32,501

\$195,713,684
\$0
\$42,461,785
\$206,834,206
\$186,808,721
\$1,228,227
\$0

TOTAL DISBURSEMENTS

III. CASH SUMMARY

Beginning Cash On Hand

Ending Cash On Hand

Net Contributions

Net Operating Expenditures

Debts/Loans Owed By

Debts/Loans Owed To

Steve Schonberg, MD,JD

7938 SE 12th Circle
Ocala, FL 34480

352-789-0610 sschonberg@aol.com

July 21, 2016

VIA USPS EXPRESS MAIL, Next Day Delivery

Clerk of Court
U.S. Federal Building and Courthouse
299 East Broward Blvd #108
Fort Lauderdale, FL 33301

Re: Motion to Intervene, CASE NO. 16-cv-61511-WJZ, Wilding et al v. DNC et al

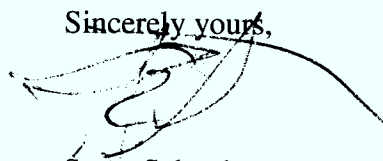
Dear Honorable Clerk of Court:

Enclosed please find my Motion to Intervene and accompanying Exhibits which I ask be scanned and filed as expeditiously as possible. The Motion requests emergency relief because it is in regard to the Democratic National Convention ending on July 28, 2016.

There are three copies of the motion enclosed for the convenience of the Court and its law clerks if needed. I am a *pro se* filer.

Thank you for your attention to this most important matter

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Steve Schonberg', with a long, sweeping horizontal line extending to the right.

Steve Schonberg

Encl: (4)